

May 7, 2025

The Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 14A
New York, NY 10007-1312

Re: *Leadenhall Capital Partners LLP et al. v. Wander et al.*, 24-cv-03453-JGK

Dear Judge Koeltl:

We write on behalf of all parties in the above-referenced action. Submitted along with this correspondence are: (i) a Proposed Confidentiality Stipulation and Protective Order, and (ii) a Proposed Stipulation and Order Governing the Protocol for Discovery of Electronically Stored Information. The materials have been negotiated and agreed to by all parties in the action, and the parties respectfully request they be entered as orders by the Court.

Plaintiff Leadenhall also requests that the Court require the parties in discovery to submit a single joint status letter on the first business day of each month, not to exceed three pages, updating the Court on progress made in discovery. Leadenhall believes that monthly joint status letters filed on the docket will ensure that the parties proceed expeditiously through discovery and that the Court has the option, if it chooses to do so, of keeping apprised of the parties' negotiations and positions in discovery before they may ripen into discovery disputes. Defendants respectfully submit that monthly joint status reports are unnecessary at this time. Defendants have been working in good faith to advance document discovery pursuant to the Court's November 26, 2024 Order, including engaging in four lengthy meet-and-confers and exchanging search parameters with Plaintiffs. Furthermore, Local Rule 37.2 already addresses informal means to resolve discovery concerns with the Court prior to any motion practice. Nevertheless, Defendants will defer to the Court's preferences.

Respectfully submitted,

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